

# EXHIBIT

“V”

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,  
(RWS)

10-cv-6005

Plaintiff,

-against-

CITY OF NEW YORK, et al

Defendants.  
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**DECLARATION OF HUGH H. MO PURSUANT TO 28 U.S.C. §  
1746 UNDER THE PENALTY OF PERJURY**

1. As an attorney who is admitted to practice law in this State and before this Court, I am submitting this declaration in support of the plaintiff's application for attorney's fees in the above-referenced action.

2. My educational background and legal experience is briefly set forth as follows:

I am founder and principal of The Law Firm of Hugh H. Mo, P.C., established on January 1, 1994. I was admitted to practice in 1977, and have worked in the private and public sectors. I graduated from New York University, with a B.A. majoring in history and political science, and received my Juris Doctor degree from Boston University of Law. After eight years as an Assistant District Attorney with the Manhattan District Attorney's Office, including two years in the city-wide Special Narcotics Prosecutor's office, I served for four years as Deputy Commissioner-Trials in the New York City Police Department; at the time, the highest ranking Asian-American in New York City government. I then continued my legal practice as Partner-In-Charge for six years of the China Practice Group at the law firm of Whitman & Ranson (predecessor to Whitman, Breed, Abbott & Morgan in New York), by representing Chinese banking, corporate, litigation and real estate clients in the U.S. and overseas. I have extensive investigative and jury trial experience, including supervision of numerous complex criminal, business fraud, and internal police corruption investigations and with over fifty felony and civil jury trials. I also presided as Chief Administrative Judge in over 300 administrative trials in the New York City Police Department. During the past twenty years, My Firm and I have been actively engaged in the practice of white collar criminal defense and complex commercial and corporate litigation in the federal and state courts, administrative tribunals, and hearings before the American Arbitration Association. Additionally, the Firm has handled numerous commercial and real estate transactions. I serve

as a Referee for the New York State Commission on Judicial Conduct in which I preside at investigative appearances or depositions and due process hearings involving charges of misconduct against state judges.

3. I am familiar with the billing rates of colleagues who litigate civil rights claims. For experienced practitioners with 30 or more years of experience the rates range from \$500 to \$700 per hour.

3. I am personally acquainted with John Lenoir as an attorney. We were colleagues in the Manhattan District Attorney's office for about four years and worked together on several major cases. We have maintained contact since the 1980's, and I am familiar with his work as a federal prosecutor including his cases involving police misconduct.

4. We have conferred on various cases over the years, and I am familiar with Mr. Lenoir's work ethic and his skill in litigation of complex issues. Mr. Lenoir is an accomplished trial lawyer and highly experienced in civil rights matters involving law enforcement. In my opinion, Mr. Lenoir's request for fees at the rate of \$575 an hour is a fair and reasonable rate in the City of New York for an individual with his level of knowledge and experience in the area of police compliance and civil rights.

5. I declare that the foregoing is true and correct.

Dated: November , 2015



Hugh H. Mo